

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re
FTX TRADING, LTD., *et al.*¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**ORDER GRANTING MOTION OF WINCENT INVESTMENT
FUND PCC LIMITED FOR ENTRY OF AN ORDER ALLOWING AN
ADMINISTRATIVE EXPENSE CLAIM AND GRANTING RELATED RELIEF**

Upon the *Motion of Wincent Investment Fund PCC Limited for Entry of an Order Allowing an Administrative Expense Claim and Granting Related Relief* (the “Motion”)² of Wincent Investment Fund PCC Limited (“Wincent”), seeking entry of an order allowing an administrative claim in the amount of \$2,863,284.78 and granting related relief; and this Court having jurisdiction to consider the Motion pursuant to 28 U. S. C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue in this district being proper pursuant to 28 U. S. C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U. S. C. § 157(b); and this Court having found that proper and adequate notice of the Motion and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and objections (if any) to the

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063, respectively. Due to the large number of Debtors in these chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the Debtors’ claims and noticing agent’s website at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Motion.

Motion having been withdrawn, resolved, or overruled on the merits; and a hearing (if any) having been held to consider the relief requested in the Motion and upon the record of the hearing and all of the proceedings had before this Court; and that the legal and factual bases set forth in the Motion and the Melvin Declaration establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. Wincent is hereby granted an allowed administrative claim in the amount of \$2,863,284.78.
3. The Debtors or Reorganized Debtors, as applicable, shall pay such amount to Wincent upon or as reasonably practicable after the entry of this Order, and in no event later than ten (10) business days after entry of this Order.
4. The Court shall retain jurisdiction with respect to any matters, claims, rights, or disputes arising from or related to this Order.